

# **EXHIBIT A**

# NOOM PRIVACY POLICY

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## NOOM, INC. PRIVACY POLICY

Please read this Privacy Policy (this “**Privacy Policy**”) carefully. To use the Services that Noom and its affiliates (collectively “**Noom**”, “**we**”, “**us**”, or “**our**”) provide, you as a user of the Services must accept this Privacy Policy (“**User**”, “**you**”, “**your**”). If you do not consent to the terms of the Privacy Policy, please do not access or use the Services.

**Personal Information.** Your privacy is important to Noom, and Noom is committed to carefully managing your individually identifiable information (“**Personal Information**”) in connection with the Services that Noom provides. “**Personal Information**” means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address or other contact information. This Privacy Policy describes the information practices for Noom, including what type of information is gathered and tracked, how the information is used, and with whom the information is shared. Noom is committed to protecting the privacy of the data you provide in the Service as appropriate, but at the same time encouraging you to interact with and share information about your progress with other users using the Services.

**Protected Health Information.** Noom is also committed to protecting the privacy of your protected health information (“**Protected Health Information**”). “**Protected Health Information**” is a subset of Personal Information that is information about you, including demographic information, that may identify you and that relates to your past, present or future physical or mental health or condition; related health care services; or related to the past, present, or future payment for the provision of health care to you.

For a description of how we may use and disclose your Protected Health Information to carry out treatment, payment or health care operations and for other purposes that are permitted or required by law, including the Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”), please refer to our HIPAA Notice of Privacy Practices (“**HIPAA Notice**”). Any conflict between this Privacy Policy and the HIPAA Notice with respect to such submitted Protected Health Information shall be governed by the HIPAA Notice.

This Privacy Policy applies to our Services operated in the United States, Korea and Japan, and we provide this Privacy Policy explaining our online information practices and the choices you can make about the way Personal Information is collected and used in connection with the Service. By using the Website and the Mobile App, User acknowledges and accepts this Privacy Policy.

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## Information That Noom Collects

**Personal Information.** We have implemented this Privacy Policy because your privacy, and the privacy of other Service users, is important to us. We operate in accordance with applicable data protection legislation and regulations. We recognize the importance of protecting the privacy of Personal Information collected about our users. This Privacy Policy discloses what Personal Information we gather, how we use it, and how you can correct or change it. It is our intention to give you a much control over your Personal Information as possible to preserve your privacy, while still allowing us to utilize that Personal Information in the course of our business to provide you a valuable service.

**Consent and Modification.** By using the Service, you consent to the terms of this Privacy Policy and to our processing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not use the Service. We reserve the right, at our discretion, to change this Privacy Policy at any time, which change shall become effective upon posting by the Company on the Website, the Mobile App, via the Service or sending you an email or other notification. You will be deemed to have agreed to Additional Terms (as defined in the Terms & Conditions) by your decision to continue accessing the Mobile App or the Website or otherwise using any of the Services following the date in which such Additional Terms become effective.

**Receipt and Collection of Information.** We collect Personal Information from users. In each case, you will only be required to provide the Personal Information that we need in order to be able to provide the services you have requested. You may be entitled under data protection laws to access and review the Personal Information that we hold on you, if you provide the necessary consent and background information and pay any mandated fee. All such communications regarding access to your personal data should be addressed to: [support@noom.com](mailto:support@noom.com). Such inquiries should clearly be marked as data protection queries and as being time sensitive.

In particular, we receive and/or collect Personal Information from you in the following ways: Noom may collect and process Personal Information when User registers for or uses the Services and/or uses the Website and/or the Mobile App, interacts with the Website and/or the Mobile App, use any aspects of our Services or otherwise contacts Noom. Noom may collect and process certain Personal Information from User such as the User's name, telephone number, e-mail address, mailing address, telephone number, user name, and password. Noom uses the Users' Personal Information that Noom collects for the following general purposes: to fulfill User's request for use of certain features of the Website and/or the Mobile App, to conduct surveys, and for Noom's billing purposes. Noom may also collect and process Personal Information relating to User's use of Noom's Services and any details of any e-mail correspondence or any other social media interactions that User has with Noom. Noom will collect only as much Personal Information as Noom needs for the purposes specified in this Privacy Policy, for purposes specified at the time of collection of the Personal Information, or for other purposes that you consent to in the future.

Noom provides User the option, at User's sole election, to upload a profile image that is viewable by other participants of the Services, but this is not mandatory. User may delete User's profile picture at any time by logging into the Mobile App and visiting the profile settings page.

**Personal Health Information.** Noom may obtain your personal health information from your health care provider upon User's request and prior approval. Noom may collect certain personal health information such as User's height, weight, blood pressure, blood glucose and gender and display User's biometrics to User based on these inputs.

**Demographic & Non-Identifying Information.** Noom may collect and process demographic information from or about User at the Website and the Mobile App from time to time, such as information about User's gender, age, country, and zip code ("Demographic Information"). Noom may collect this information through various forms and in various places on the Web.

Noom also collects data about User, including about User's make-up, fitness level, health indicators, and related information that does not identify User and that enables User to fully participate in the Service.

### Information Noom Collects or Stores as User Accesses and Uses the Website and Service

In addition to any Personal Information or other information that User choose to submit to Noom via Noom's Website, Noom and Noom's third-party service providers may use a variety of technologies that automatically (or passively) store or collect certain information whenever User visits or interacts with the Website ("Usage Information"). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to User's personal computer, browser, laptop, tablet, mobile phone or other device (a "Device") whenever User visits or interacts with Noom's Website and/or the Mobiel App. To the extent Noom associates Usage Information with User's Personal Information Noom collects directly from User on the Website, Noom will treat it as Personal Information.

This Usage Information may include:

- User's IP address, UDID or other unique identifier ("Device Identifier"). A Device Identifier is a number that is automatically assigned to User's Device used to access the Website, and Noom's computers identify User's Device by its Device Identifier;
- User's Device functionality (including browser, operating system, hardware, mobile network information);
- User's subscription level;
- the URL that referred User to Noom's Website;
- the areas within Noom's Website and/or Mobile App that User visits and User's activities there, including remembering User, User's preferences and pages User requested and/or viewed;
- User's Device location;
- User's Device characteristics; and
- certain other Device data, including the time of day, among other information.

Noom may use various methods and technologies to store or collect Usage Information ("Tracking Technologies"). Tracking Technologies may set, change, alter or modify settings or configurations on User's Device. The Tracking Technologies that may be used are the following (and subsequent technology and methods later developed which perform a similar function):

• **Cookies.** A cookie is a data file placed on a Device when it is used to visit the Website. A Flash cookie (or locally shared object) is a data file placed on a Device via the Adobe Flash plug-in that may be built-in to or downloaded by User to User's Device. HTML5 cookies can be programmed through HTML5 local storage. Unlike Flash cookies, HTML5 cookies do not require a plug-in. Regular cookies may generally be disabled or removed by tools that are available as part of most commercial browsers, and in some but not all instances can be blocked in the future by selecting certain settings. Each browser User uses will need to be set separately and different browsers offer different functionality and options in this regard. Also, these tools may not be effective with regard to Flash cookies or HTML5 cookies. For information on disabling Flash cookies go to Adobe's web site [www.adobe.com](http://www.adobe.com). Please be aware that if User disables or removes cookies, Flash cookies, or HTML5 cookies on User's Device, some parts of Noom's Website, Mobile App and/or Services may not function properly, and that when User revisits Noom's Website, Mobile App and Services User's ability to limit cookies is subject to User's browser settings and limitations.

• **Web Beacons.** Small graphic images or other web programming code called "web beacons" (also known as "1x1 GIFs" or "clear GIFs") may be included in pages and messages of our Website, Mobile App and Services. Web beacons may be invisible to User, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Website, Mobile App and Services, to monitor how users navigate the Website, Mobile App and Services, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.

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• **ETag, or entity tag.** A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.

Noom may use Tracking Technologies for a variety of purposes, including:

• **Strictly Necessary.** Noom may use cookies or other Tracking Technologies that Noom considers is strictly necessary to allow User to use and access Noom's Website, Mobile App and Services, including cookies required for system administration, to prevent fraudulent activity, or to improve.

• **Performance Related.** Noom may use cookies or other Tracking Technologies that are useful in order to assess the performance of the Website, Mobile App and Services, including as part of Noom's analytic practices or otherwise to improve the content, products or services offered through the Website, Mobile App and Services.

• **Functionality Related.** Noom may use cookies or other Tracking Technologies that are required to offer User enhanced functionality when accessing the Website, including identifying User when User sign in to Noom's Website or keeping track of User's specified preferences, including in terms of the presentation of content on Noom's Website.

Noom obtains User's consent to Noom's information storage or collection Tracking Technologies by providing User with transparent information in Noom's Privacy Policy and providing User with the opportunity to make a choice to disable cookies as set forth above. Please note that Noom is not required to obtain User's consent to the information collection Tracking Technologies identified above that is strictly necessary. User has the right to object to other use of information storage or collection technologies.

There may be other Tracking Technologies now and later devised and used by Noom in connection with the Website, Mobile App and Services. Further, third parties may use Tracking Technologies with Noom's Website. Noom does not control those Tracking Technologies and Noom is not responsible for them. However, User consents to potentially encountering third party Tracking Technologies in connection with use of Noom's Website, Mobile App and Services and accepts that Noom's statements under this Privacy Policy do not apply to the Tracking Technologies or practices of such third parties. User should check the third party websites to confirm how User's information is collected and used.

Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party websites or online services (e.g., browser do not track signals). Currently, Noom does not monitor or take any action with respect to these signals or other mechanisms.

### Information Third Parties Provide About User

Noom may, from time to time, supplement the information Noom collects directly from User at the Website, Mobile App and Services with outside records from third parties for various purposes, including to enhance Noom's ability to serve User, to tailor Noom's content to User and to offer User opportunities that may be of interest to User. To the extent Noom combines any non-personally identifiable information Noom receives from those sources with User's Personal Information Noom collects on the Website, Mobile App and Services, it will be treated as Personal Information and Noom will apply this Privacy Policy to such combined information, unless Noom has disclosed otherwise.

### Interactions with Third-Party Websites

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Website, Mobile App and Services or otherwise link accounts. If Noom offers and User chooses to use this functionality to access Noom's Website, Mobile App and Services, the third-party site or application may send Personal Information about User to the Website and/or Mobile App. If so, Noom will then treat it as Personal Information under this Privacy Policy, since Noom is collecting it as a result of User's accessing of and interaction on Noom's Website, Mobile App and Services. In addition, Noom may provide third-party sites' interfaces or links on the Website, Mobile App and Services to facilitate User sending a communication from the Website, Mobile App and Services. For example, Noom may use third parties to facilitate emails, text messages, blog postings, tweets or Facebook postings. These third parties may retain any information used or provided in any such communications or other activities and these third parties' practices are not subject to Noom's Privacy Policy. Noom may not control or have access to User's communications through these third parties. Further, when User uses third-party sites or services, User is using their services and not Noom's services and they, not Noom, are responsible for their practices. User should review the applicable third-party privacy policies before using such third-party tools on Noom's Website.

## How Noom Uses the Personal Information

Except as set forth in this Privacy Policy or as specifically agreed to by User, Noom will not disclose any information Noom gathers from User on Noom's Website, Mobile App and Services. Except as set forth in this Privacy Policy, Noom does not share User's Personal Information with third parties for those third parties' direct marketing purposes. Noom may provide third parties information about User that does not allow User to be identified or contacted, including where such information is combined with similar information of other users of Noom's Website, Mobile App and Services. For example, Noom might inform third parties regarding the number of unique users who visit and/or use Noom's Services, the demographic breakdown of the registered users of Noom's Services, or the activities that users engage in while on Noom's Website and Mobile App.

In connection with the Business Premium Services, the Business Customer may disclose certain Personal Information to Noom. To the extent that Noom collects and processes Personal Information supplied by the Business Customer, Noom is considered to be the data controller for the purposes of European data protection legislation and Noom will process User's Personal Information in accordance with this Privacy Policy.

Noom may use User's information that Noom collects about User:

- to contact User occasionally to inform User of new Services features, or news or articles Noom thinks will be of interest to User. Noom may send User regular updates on issues Noom thinks will be of interest to User;
- to contact User with regard to User's use of the Services and, in Noom's discretion, changes to the Services and/or the service policies;
- for internal business purposes;
- for purposes disclosed at the time User provide User's information or as otherwise set forth in this Privacy Policy;
- to provide User with information or services or process transactions that User has requested or agreed to receive including to send User electronic newsletters;
- to provide User with marketing materials or relevant advertising, promotions and recommendations from Noom or our business partners;
- to enable User to participate in a variety of the Service features;
- to process User's account registration, including verifying User's information is active and valid;
- to identify User as the author of any comments that User sends to Noom to be posted on the Website or Mobile App;
- to ensure that content on the Website and Mobile App is presented in the most effective manner for User and for User's computer or mobile device;

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sending an email to [support@noom.com](mailto:support@noom.com).

## How and When Does Noom Disclose Information To Third Parties?

Noom may share User's Personal Information, including performance measurement information associated with User's name that is collected or generated at the Website, Mobile App or through the Services.

Personal Information may occasionally be transferred to third parties who act for Noom for further processing in accordance with the purposes for which the data was originally collected or for purposes to which User has subsequently consented. For example, sometimes a third party may have access to User's Personal Information in order to support Noom's information technology or to handle mailings on Noom's behalf. If Noom transfers User's Personal Information to outside agent or organization for such purpose, Noom will take appropriate measures in an effort to protect User's privacy and the Personal Information Noom transfer.

Noom may share your Personal Information with various business partners. Some of these business partners may use your personal information to facilitate the offering of services or products that may be of interest to you. We may also share your Personal Information as otherwise described to you at the time of collection.

Noom may, in Noom's sole discretion, share or transfer Personal Information where permitted or required by law, to comply with legal process, to interact with anti-fraud databases, to protect User's vital interests, to protect the security or integrity of Noom's databases or the Website and the Mobile App, to enforce the Terms & Conditions or protect the business or reputation of Noom and/or its Business Customers, to take precautions against legal liability, to protect and defend the rights or property of Noom and/or its Business Customers, for required institutional risk control, or for resolving disputes, inquiries or complaints with respect to User's use of the Website, Mobile App and Services.

Noom reserves the right to disclose and transfer all Personal Information: (i) to an operator of the Website or Mobile App if applicable database provided such entity agrees to be bound by the terms and conditions hereof to the extent applicable; (ii) to a successor in interest of Noom in connection with a merger, consolidation, restructuring, change of control, the sale of substantially all of Noom's interests and/or assets or other organizational change, including, during the course of any due diligence process, provided such successor entity agrees to be bound by the terms and conditions hereof.

## What About Information User Disclose Publicly Or To Others?

**User-Generated Content and Public Information.** "User Content" is any content, materials or information (including without limitation, any text, information, graphics, messages, photos, images, nutritional information contributed to the Food Database and works of authorship kind), data, questions, comments, suggestions or other content, including personally identifiable information that you upload, send, email, display, perform, distribute, post or otherwise transmit to us, at our request or on your own, on, or through the Services (such as message boards, recipe logging), whether in connection with your use of the Services or through the use of any Third Party Websites or Third Party Services or otherwise, and whether publicly posted or privately transmitted.

Noom or others may store, display, reproduce, publish, distribute or otherwise use User Content online or offline in any medium or format (currently existing or hereafter developed) and may or may not attribute it to User. Others may have access to the User Content and may have the ability to share it with third parties. Please think carefully before deciding what information User shares, including Personal Information, in connection with User's User Content. Be aware that public postings (including group messaging with other Users) are not confidential. Please note that the Noom does not control who will have access to the information that User chooses to make public, and cannot ensure that parties who have access to such publicly available information will respect User's privacy or keep it secure. Noom is not responsible for the privacy or security

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User's User Content, and Noom may use the content, or any portion of the content, for advertising, marketing, publicity and promotional activities, provided that Noom will not exercise such rights as to any User Content which identifies User in a public manner (other than in providing the Services to the Business Customer and the Business Customer's other participants) unless User provides a separate consent to Noom in writing (email is sufficient) authorizing such use. For full terms and conditions regarding User Content User submits to the Service, please review Noom's Terms & Conditions.

**Profiles.** A User's profile page may be, by default, set up to display information such as the User's display name, images, location (city/state/country), groups that the User has joined and optional information added by User. Profile information is used by Noom primarily to be presented back to and edited by User when User accesses the Service and to be presented to others permitted to view that information on the Service. Noom may offer users the ability to manage their public profile and use profile preference settings, the functionality and features of which are subject to change from time to time, so visit it frequently to confirm the settings reflect User's then current preferences and Noom recommends that User does not post information or content as part of User's profile that User is not prepared to make public. Changing setting options may not result in immediate changes to the settings, which are subject to Noom's operations and maintenance schedules. User should carefully consider the use of such settings to improve information display options and to ensure the settings are properly set and functioning in the manner desired. Notwithstanding the availability of profile preference settings, User should be aware that these settings are for convenience only, do not employ complex data security protection and may not be error free. Further, other users that have access may repost or otherwise make public User's information or content. Accordingly, discretion and good judgment should be exercised when posting information or content as part of User's profile.

**Use of Anonymous Information.** We may use Anonymous Information (as defined below), or disclose it to third party service providers, to provide and improve the Service. We may also disclose Anonymous Information (with or without compensation) to third parties, including advertisers and partners, for purposes including, but not limited to, targeting advertisements. **"Anonymous Information"** means information which does not enable identification of an individual user, such as aggregated information about use of the Service.

**Opting Out.** You may choose not to receive future promotional, advertising, or other Service-related notifications from us by changing the notification settings on your device. If you choose not to receive notifications, you may still use the Service but you may not receive, or may be unable to use, certain services that involve our interaction with you.

**Choice.** At all times, you may choose whether or not to provide or disclose Personal Information. The notices that we provide on the Service in circumstances where we collect Personal Information should help you to make this choice. If you choose not to provide the Personal Information we request, you may still use the Service, but you may be unable to access certain programs and services that involve our interaction with you.

**Access/Accuracy.** To the extent that you do provide us with Personal Information, we wish to maintain accurate Personal Information. If you would like to delete or correct any other of your Personal Information that we may be storing, you may submit a request to us by sending an email to [support@noom.com](mailto:support@noom.com). Your email should include adequate details of your request.

**Collection of Information by Third-Party Websites.** We may use a reputable third party to present or serve advertisements that you may see on the Service. These third party ad servers may use cookies, web beacons, clear gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy.

we do not intend to collect Personal Information from anyone we know to be under 13 years of age. We will direct potential users under 13 years of age not to use the Service. If we learn that Personal Information of persons less than 13 years of age has been collected without verifiable parental consent, then we will take the appropriate steps to delete this information. To make such a request, or if there are any questions or concerns about the Privacy Policy for the Service or its implementation, please contact us at [support@noom.com](mailto:support@noom.com).

**Security.** The security of your Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security, you can contact us at [support@noom.com](mailto:support@noom.com).

Please be aware that certain Personal Information and other information provided by you in connection with your use of the App may be stored on your device (even if we do not collect that information). You are solely responsible for maintaining the security of your device from unauthorized access.

**Merger, Sale or Bankruptcy.** If we are acquired by or merged with a third party entity, or if we are subject to a bankruptcy or any comparable event, we reserve the right to transfer or assign Personal Information in connection therewith.

### Notice to California Residents

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit: <https://web.noom.com/terms-and-conditions-of-use/CCPA-notice-for-California-residents/>

### California Online Privacy Protection Act Notice

On September 27, 2013, California enacted A.B. 370, amending the California Online Privacy Protection Act to require website operators like us to disclose how we respond to "Do Not Track Signals"; and whether third parties collect personal identifiable information about users when they visit us.

(1) We do not track users, who do not interact with its sharing functionality across the web, and therefore do not use "do not track" signals.

(2) We do not authorize the collection of personally identifiable information from our users for third party use through advertising technologies without separate member consent.

California Civil Code Section 1798.83 also permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to [support@noom.com](mailto:support@noom.com). Please note that we are only required to respond to one request per customer each year.

### Personal Information Access and Corrections

Upon receipt of User's written request and upon Noom's receipt of enough information to permit Noom to identify User's Personal Information, Noom will disclose to User the Personal Information Noom holds about User. Noom will also correct, amend or delete any Personal Information that is inaccurate and notify any third party recipients of the necessary change. User may update any information User has given to Noom by sending an email to [support@noom.com](mailto:support@noom.com). Requests to delete Personal Information are subject to any applicable legal and ethical reporting or document retention obligations imposed on Noom.

### Notice to Residents of the European Economic Area

## How to exercise your rights

Noom takes steps to keep your Personal Information accurate and up to date. If you reside in the European Economic Area you have certain rights to the Personal Information that we have collected about you. To exercise your rights to your Personal Information, please contact us at [GDPRsupport@noom.com](mailto:GDPRsupport@noom.com) or at the address listed below. Subject to applicable law and in exceptional circumstances only, we may charge for this service and we will respond to reasonable requests as soon as practicable, and in any event, within the time limits prescribed by law.

Right to lodge a complaint before the Data Protection Authority

We encourage you to contact us directly and allow us to work with you to address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or the place of the alleged infringement. You have the right to do so if you consider that the processing of Personal Information relating to you infringes applicable data protection laws.

Changes to this Notice to Residents of the European Economic Area

In order to enhance our Services it might be necessary to change this Notice to Residents of the European Economic Area from time to time. We therefore reserve the right to modify this Notice to Residents of the European Economic Area in accordance with the applicable data protection laws. Please visit our Website from time to time for information on update to this Notice to Residents of the European Economic Area.

How to contact us or our privacy office as a Resident of the European Economic Area

In case of questions about the processing of your Personal Information please contact us at [GDPRsupport@noom.com](mailto:GDPRsupport@noom.com).

If we are required under applicable law to appoint a data protection officer (DPO), you can contact the DPO that is responsible for your country/region at [GDPRsupport@noom.com](mailto:GDPRsupport@noom.com).

For the purposes of applicable data protection laws, Noom, Inc. is the controller of the Personal Information you provide to us or to our mobile apps. As a data controller, we process the Personal Information we maintain about you in accordance with this Privacy Policy.

## Our Accountability/Dispute Resolution

Noom uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the promises in this policy. Noom encourages interested persons to raise any concerns using the contact information provided and Noom will investigate and attempt to resolve any complaint and disputes regarding use and disclosure of Personal Information in accordance with this policy.

## Noom Service: International Users

Noom's Service is operated in the United States. If User is located outside of the United States, please be aware that information Noom collects, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which User is located, and User's Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. U.S. law may not provide the degree of protection for Personal

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outside the U.S. you acknowledge that you are doing so on your own initiative, at your own risk, and are responsible for compliance with applicable laws.

## Business Transitions

In the event Noom goes through a business transition, such as a merger, acquisition by another organization, or sale of all a portion of its assets, User's Personal Information might be among the assets transferred. User will be notified via this Website of any such change in ownership or control of User's Personal Information.

## How can I get more information about the Privacy Policy?

If User has questions or concerns about the Privacy Policy, User can contact Noom at:

Noom, Inc.  
 Attention: Privacy Officer  
 229 W. 28th Street, 9th Floor  
 New York, NY 10001  
[support@noom.com](mailto:support@noom.com)

## Updates/Modifications

Noom reserves the right to amend this Privacy Policy at any time as needed with notice provided to User. Changes will take effect upon User's acceptance of the modified terms and User's continued use of the Website, Mobile App and/or Services.

Last Updated: December 17, 2018

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